

## **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

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SPERO HARITATOS, an Individual,

Plaintiff,

v.

**AMENDED MANDATORY  
DISCLOSURE**

05-CV- 930 (DNH/GJD)

HASBRO, INC., a Rhode Island corporation and  
TOYS "R" US-NY LLC, a New York limited  
liability corporation,

Defendants.

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**SIRS:**

**PLEASE TAKE NOTICE** that pursuant to Fed. R. Civ. P. 26(a), defendant, Toys "R"  
US - DELAWARE, INC. successor to Toys "R" US - NY LLC ("TRU"), states as follows:

1. Individuals known or believed to have information with respect to claims and  
defenses:

NAME	CONTACT INFORMATION	TOPICS
Kathleen Szymanski, currently Vice President Marketing and In Store Presentation Manager; formerly Vice President and General manager Toys "R" Us	Bond, Schoeneck & King PLLC	Use of the term CANDY LAND including signage, promotional material; discontinuance of use upon commencement of this suit; lack of any inquiry indicating confusion with plaintiff's store or his use of the term CANDYLAND; revenues for the candy department at TRU's Times Square Store.
Ronald Lombardi, Esq., former in-house attorney for TRU	Last known address 123 Easedale Road Wayne, New Jersey	Negotiations and discussions with Hasbro for license to use their famous mark CANDYLAND.
Michael Tabakin, Director Corporate Marketing – Licensing & Entertainment	Bond, Schoeneck & King PLLC	limited knowledge of the use of the term CANDY LAND and TRU's motivation for its use.
Greg Staley	last known address 286 Autumn Terrace Franklin Lakes, N.J. 07417	limited knowledge of the use of the term CANDY LAND.
Warren Kornblum	last known address 21050 Point Place Suite 804 Aventura, Fl. 33180	limited knowledge of the use of the term CANDY LAND.
Joel Anderson	last known address 6909 St. Patrick's Place Edina, Mn. 55439	limited knowledge of the use of the term CANDY LAND.
Elliott Wahle	last known address 21668 Arriba Real Boca Raton, Fl. 33433	limited knowledge of the use of the term CANDY LAND.
Spero Haritatos		It is expected that Mr. Haritatos will be able to testify with regard to any efforts made by him or others acting upon his direction to identify those using his claimed mark and efforts to cause such use to cease.

TRU is aware from other disclosures in this case that there may have been discussions and negotiations between this plaintiff and Hasbro, Inc. with respect to use of this mark and/or sale of it, but not having been party to those discussions, TRU identifies no one with any knowledge of such discussions but reserves the right to inquire upon deposition with respect to any aspect of those discussions

2. As part of its Initial disclosures, TRU provided documents Bates Stamped TRU 000001 through TRU 000243. These documents include all documents relating to negotiation of the license agreement with Hasbro, Inc. TRU supplements that disclosure by reference to documents Bates Stamped TRU 000244 through TRU 000356 which have been provided in response to plaintiff Notice to Produce Documents. In addition, be advised that there are written communications which are sent by or to TRU's attorneys for which the attorney-client privilege is asserted.

3. No expert witness has been retained by Toys "R" Us as of this date.

Dated: April 5, 2006



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